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FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

MAY - 9 2024

SEAN F. McAVOY, CLERK
SPOKANE, WASHINGTON

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON**

UNITED STATES OF AMERICA,

2:24-CR-70-TOR

Plaintiff,

INDICTMENT

V.

ROSE MARIE FERGUSON,

Defendant.

Vios: 18 U.S.C. § 932(b)(1), (c)(1)
Straw Purchasing of a Firearm
(Count 1)

18 U.S.C. §§ 922(a)(6),
924(a)(2)
False Statement During
Purchase of a Firearm
(Count 2)

18 U.S.C. § 924(d)(1),
28 U.S.C. § 2461
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

On or about September 15, 2022, in the Eastern District of Washington, the Defendant, ROSE MARIE FERGUSON, did knowingly purchase a firearm, to wit: a Kimber 45 ACP Rapide pistol, bearing serial number K856257, in or otherwise affecting interstate and foreign commerce for, on behalf of, and at the request or

INDICTMENT - 1

1 demand of Eric Shane Laducer, knowing or having reasonable cause to believe that
2 Eric Shane Laducer had previously been convicted in any court of a crime
3 punishable by imprisonment for a term exceeding one year, in violation of
4 18 U.S.C. § 932(b)(1), (c)(1).

5 COUNT 2

6 On or about September 15, 2022, in the Eastern District of Washington, the
7 Defendant, ROSE MARIE FERGUSON, in connection with the acquisition of a
8 firearm, to wit: a Kimber 45 ACP Rapide pistol, bearing serial number K856257,
9 from North 40 Outfitters, a licensed dealer of firearms within the meaning of
10 Chapter 44, Title 18, United States Code, knowingly made a false and fictitious
11 statement to the licensed dealer, which statement was intended and likely to
12 deceive the dealer, as to a fact material to the lawfulness of such acquisition to
13 ROSE MARIE FERGUSON under Chapter 44, Title 18, to wit: ROSE MARIE
14 FERGUSON executed a Department of Justice, Bureau of Alcohol, Tobacco,
15 Firearms and Explosives Form 4473 Firearms Transaction Record and answered
16 that ROSE MARIE FERGUSON was the actual transferee/buyer of the firearm, in
17 violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

18
19 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

20 The allegations contained in this Indictment are hereby realleged and
21 incorporated by reference for the purpose of alleging forfeitures.

22 Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction
23 of an offense in violation of 18 U.S.C. § 932(b)(1), (c)(1), as set forth in Count 1,
24 and/or 18 U.S.C. §§ 922(a)(6), 924(a)(2), as set forth in Count 2, the Defendant,

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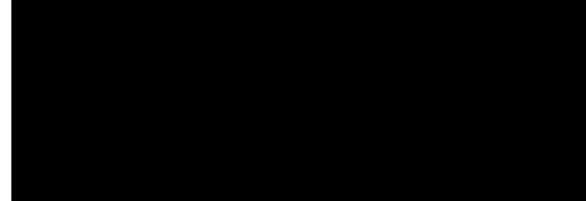
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1 ROSE MARIE FERGUSON, shall forfeit to the United States of America any
2 firearm or ammunition involved or used in the commission of the offense.
3

4 DATED this 8 day of May, 2024.
5

6 A TRUE BILL
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12 Vanessa Waldref
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